

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No.: 1:20-CR-254

JIN HORNG HONG,

Hon. Anthony J. Trenga

Defendant.

MOTION FOR THE ENTRY OF AN ORDER VACATING DEFENDANT'S SELF
REPORTING DATE

Comes now Defendant, JIN HORNG HONG, by counsel and hereby moves this Honorable Court to vacate the self reporting date of November 1, 2021 which is the date he is currently ordered to report to a BOP contract facility in Milan Michigan to commence service of his sentence. As grounds for this motion, Defendant respectfully states as follows:

1. Subsequent to the imposition of sentence in this case an arrest was made of Quinben Chen, Case No. 1:21-CR-189-RDA, who procured defendant to engage in the conduct for which he pled guilty in the instant case. The Government has advised Mr. Hong's testimony is essential in that case.

2. The Government has advised that the speedy trial act runs in that matter on December 2, 2021. No trial date has yet been set.

3. The Government has requested that this motion be filed asking for Mr. Hong's self reporting date to be vacated and the matter set for status during the second week of December 2021 at a time the trial date and status of that case will be known.

4. Defendant stands willing to testify in the matter.

5. The Government as advised it fully concurs with the request of this motion

Wherefore, Defendant prays that an appropriate Order issue. A proposed Order is attached.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record this 1st day of October, 2021.

/s/

Gregory E. Stambaugh
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